IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	§	
	§	
FREE SPEECH SYSTEMS, LLC	§	
	§	Case No. 22-60043-11
Debtor	§	(Subchapter V)

SUBCHAPTER V TRUSTEE'S REPORT AND RECOMMENDATION OF CASE DISPOSITION

TO THE HONORABLE CHRISTOPHER M. LÓPEZ, U.S. BANKRUPTCY JUDGE:

NOW COMES, MELISSA A. HASELDEN, Subchapter V Trustee ("Trustee") in the Free Speech Systems, LLC (the "Debtor"), and files this Subchapter V Trustee's Report and Recommendation of Case Disposition, and shows the Court as follows:

SUMMARY OVERVIEW

- 1. After nearly two years of hard work by all parties, the Debtor's case is at an unfortunate crossroads. The parties were unable to reach a consensual resolution that allowed for a confirmed chapter 11 plan. The disagreements with regards to the Debtor's estate continue. The differences of option go beyond merely the decision to dismiss or convert. The divisions include what provisions of any order should be included.
- 2. The events of June 2024 are a culmination of a propaganda campaign by Jones which has become increasingly toxic and damaging to the FSS estate. After evaluating the circumstances and events of this case, extensive discussions with the counsel for the Texas Plaintiffs, the Connecticut Plaintiffs, FSS and the CRO, counsel for Alex Jones, and counsel for PQPR, and evaluating the various pleadings and proposed orders, the Subchapter Trustee recommends conversion of this case to chapter 7 as being in the best interest of the FSS estate. The Trustee sets out the basis of this recommendation but also includes aspects of any conversion

or dismissal order that the Court should consider.

RELEVANT BACKGROUND

- 3. Debtor commenced this bankruptcy case by filing a voluntary petition under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") and electing to proceed under subchapter V of chapter 11 on July 29, 2022 (the "Petition Date").
- 4. On August 2, 2022, the Office of the United States Trustee for Region 7 appointed Melissa A. Haselden as the Trustee in this case [Dkt. No. 22].
- 5. On September 20, 2022, the Court entered its Order Expanding Subchapter V Trustee's Duties under 11 U.S.C. §1183(b)(2) and requiring Trustee to file a report pursuant to 11 U.S.C. §1106(a)(3) & (4) ("Trustee Order") [Docket #183].

ROLE OF THE SUBCHAPTER V TRUSTEE

- 6. The Bankruptcy Code requires that the subchapter V trustee act as a fiduciary for creditors in lieu of an appointed creditors' committee. Subchapter V trustee is charged with facilitating the subchapter V debtor's small business reorganization and monitoring the subchapter V debtor's consummation of its plan of reorganization. *See generally* 11 U.S.C. 1183.
- 7. Additionally, the subchapter V trustee duties include several chapter 7 trustee duties as incorporated in 11 U.S.C. 1183, including, furnishing such information concerning the estate and the estate's administration as is requested by a party in interest, unless the court orders otherwise. *See generally* 11 U.S.C. 1183(b); *See also* 28 U.S.C. 704(a).
- 8. The Trustee filed the Subchapter V Trustee's Initial Findings of Free Speech Systems, LLC Investigation on April 4, 2024. *See* Docket # 550. The Report contained an extensive description of the Debtor's methods of operations and other matters. On June 2, 2024, the Trustee filed Subchapter V Trustee's Third Interim Status Report. *See* Docket #920. The Third

Interim Status Report outlined recent issues related to concerning operational and broadcast issues of the Debtor. The Trustee incorporates those reports as background information for consideration. The Trustee is including a recitation of events since the Third Interim Status report so as to illustrate the devolving situation that deepens her concerns. The Trustee is filing this report to advise the parties and the Court of considerations and recommendations with regards to how to proceed with the end of the Debtor's chapter 11 case.

EVENTS SINCE THE THIRD INTERIM STATUS REPORT

9. Since June 7, 2024, Jones initiated repeated on-air attacks of the Sandy Hook plaintiffs (including promoting new conspiracy theories); continued denigration of the bankruptcy process and publication of the CRO's photo and a recording of a telephone call with the CRO; questioning who has authority over the company and that he (Jones) is in charge in all regards; discussed on-air confidential settlement negotiations from the April mediation; and urged viewers to sponsor and support his father's products since InfoWars is "dead".

Broadcasts Relating to the Sandy Hook School Shooting

10. One June 7, 2024, Jones continues his push for another potential conspiracy against the Sandy Hook Plaintiffs by stating:

[he] barely ever talked about [Sandy Hook]. Thought it really happened at first. Now we do think it happened and know what really went on. I believe Lanza¹ had other shooters with him. And then other people go and question it, it becomes a huge story....

¹ According to media reports at the time of the Sandy Hook shooting, Adam Lanza is the party responsible for the tragedy. See https://abcnews.go.com/Blotter/connecticut-school-shooting-adam-lanza-mother-visited-gun/story?id=17992396; also see https://www.npr.org/sections/thetwo-way/2012/12/16/167379387/obama-to-visit-conn-town-reeling-from-school-shooting; also see https://www.nytimes.com/2012/12/15/nyregion/shooting-reported-at-connecticut-elementary-school.html

See The Alex Jones Show, June 7, 2024, https://www.infowars.com/posts/infowars-on-the-edge-alex-jones-gives-a-bankruptcy-update/ at 11min 27 seconds.

11. On Sunday, June 9, Jones continues this narrative by stating:

People actually think I killed these kids. And at some point, I'm going to release the information. But I've figured out why they got so upset at me. Because we were on to what really happened with the men in the woods, and the camo, and the stand down and the school being closed, and all of that. That I've even had locals called, liberals saying it was closed. It was because kids really died there folks, but the official story you've been told is not it. So don't worry. I've now figured all this out and very soon, it's how we got set up and everything else. It's absolutely insane.

See The Alex Jones Show, June 9, 2024, https://www.banned.video/watch?id=66665f4f6d7023ad8e22f5af at 18mins 19secs.

12. During the same broadcast, Jones stated:

And Adam Lanza reportedly interned at the CIA. But you never hear his name in all these articles.

See The Alex Jones Show, June 9, 2024,

https://www.banned.video/watch?id=66665f4f6d7023ad8e22f5af at 18mins 6 secs.

13. Later in the same broadcast, Jones expresses his frustration with various news articles about his bankruptcy and lashes out at the Sandy Hook Plaintiffs claiming they do not want money, but instead they want to control Jones. Jones goes on to state:

They're desperate. They're using dead kids as their cudgel, as their club to take over.

See The Alex Jones Show, June 9, 2024,

https://www.banned.video/watch?id=66665f4f6d7023ad8e22f5af at 1hour 39mins 43secs.

14. Jones discusses Sandy Hook Plaintiffs when he states:

The so called Sandy Hook families, are being used by the Justice Department, by the FBI, to be the front people for this. When you read articles about Sandy Hook families agree to liquidate InfoWars, just put in there, William Aldenberg, General Counsel for the FBI in Connecticut who testified two years ago in court, that he went and organized all this against me [Jones].

See The Alex Jones Show, June 10, 2024.

https://www.banned.video/watch?id=66672c56bd1c9f8c6897ef24 at 57secs.

15. The First Amendment is a foundational right of citizens of the United States of America. However, there are limits and consequences for one's statements. The Trustee is concerned that Jones' increasingly poisonous rhetoric, including slipping back into post-petition unsubstantiated theories related to the Sandy Hook shootings, creates potential additional financial harm to the estate.

Direction of Business to a Company Owned by Jones' Father²

16. Jones continues to urge viewers to support drjonesnatuals.com and not FSS products. On June 1, 2024, Jones tells his followers that by supporting drjonesnaturals.com, the viewers will be supporting Jones' family as the InfoWars store is "overrun;" "done;" and "gone". Jones further viewers that his dad has set up DrJonesNaturals.com because his father knew InfoWars would be shut down and urges viewers to support his "embattled family" by purchasing from DrJonesNaturals.com and that drjonesnturals.com has "emergency stuff backed up".

See The Alex Jones Show, June 1, 2024,

https://www.banned.video/watch?id=665bd478dd54fb4e9f260a5b at 3 hours, 41 minutes and 06 seconds

17. Jones further told his followers that InfoWars is "gone"; that his viewers will not buy products from InfoWars without his promotion. In the broadcast, Jones states:

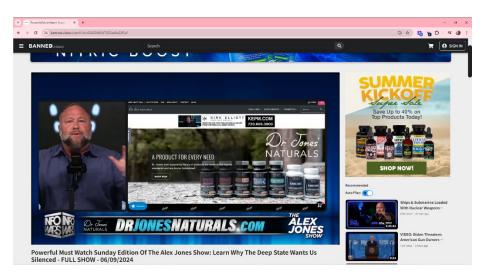
[l]et me tell you what's going on. There are no assets other than products that are worthless if I don't promote them. Our listeners will never buy those from

² An informal arrangement was agreed between CRO and Jones to promote Dr Jones Naturals for a fee to FSS, in a manner similar to other third party ads which are promoted on the show for products not sold directly by FSS. However, Jones promotion of the site in the manner described herein was not contemplated.

you if I'm gone. No matter how much they love them. And the rest of the story is I will not sell out or be compromised to stay on air here and be a puppet. So there's that. And I will not work with the CRO if they try and keep him on as the liquidator.

See The Alex Jones Show, June 7, 2024, https://www.infowars.com/posts/infowars-on-the-edge-alex-jones-gives-a-bankruptcy-update/ at 9mins 50secs.

- 18. Jones emphasizes to viewers that InfoWars is "on its deathbed and on a respirator" and that viewers are "probably safe" to get products they order, however in a week or so, Jones will "probably be saying something different." *See The Alex Jones Show*, June 9, 2024, https://www.banned.video/watch?id=66665f4f6d7023ad8e22f5af at 28mins 53secs.
- 19. Jones further pushes his father's company, Dr Jones Naturals, throughout every broadcast for the past week including keeping a manner on the screen for an extended period of time throughout the broadcasts.



20. Jones boosts his father's company by stating:

Wherever we go in the future, whatever happens, that's my dad's company. And he's going to be a sponsor for the future.

See The Alex Jones Show, June 7, 2024, https://www.infowars.com/posts/infowars-on-the-edge-alex-jones-gives-a-bankruptcy-update/ at 9mins 50secs.

21. Jones further encouraged his viewers toward his father's company by stating:

To help keep us on the air folks, whatever comes out of this, you need to support our sponsor, and that's DrJonesNaturals.com. DrJonesNaturals.com, there's a page sponsor at Free Speech Systems, all there, and it's supporting this whole operation. Go there if you support what I'm doing and want to have us funded with whatever's coming.

See The Alex Jones Show, June 7, 2024, https://www.infowars.com/posts/infowars-on-the-edge-alex-jones-gives-a-bankruptcy-update/ at 49mins 41secs.

22. Jones discusses what products you can't get at InfoWars are available at his father's company:

If you want to support what I'm doing, into the future, my dad's company, DrJonesNaturals.com is incredible supplements and products. A lot of the products you can't get at InfoWars anymore are there. And others ones you can't get, will be there. So mark down DrJonesNaturals.com, 1 word. And go there if you want to support what we're doing.

See The Alex Jones Show, June 10, 2024

https://www.banned.video/watch?id=66672c56bd1c9f8c6897ef24 at 22mins 30secs.

23. Jones further discusses about InfoWars products:

They're like bitching, 'what's Jones on air, you know, saying he doesn't know how long you can order from InfoWarsStore.com.' I'm not going to get up here and tell you to go to InfoWarsStore.com if they're all over the news saying 'imminently we're going to close it down.'

See The Alex Jones Show, June 10, 2024

https://www.banned.video/watch?id=66678fca1d90f4621912fd13 at 15mins 38secs.

24. Later Jones states:

We've already got a lot of plans and stuff. I didn't even count on my dad doing this, but he was there right at the right time and he knew what to do. If he wasn't there we'd have real issues. Go to drjonesnaturals.com and thanks dad for doing that. Thanks for helping set up the supplement company 12, 13 years ago. Now moving it over there. Drjonesnatural.com go there now and get a bunch of products and support the broadcast. I want to thank you all for your support. Go now to drjonesnaturals.com. I'm counting on you. I'm in your hands.

See The Alex Jones Show, June 10, 2024

https://www.banned.video/watch?id=66678fca1d90f4621912fd13 at 29mins 18secs.

25. Jones mentions InfoWarsStore.com but always alludes to the fact that Jones believes InfoWars may be shut down and not deliver products to its customers, which he later walks back and tells customers it may be their "last chance". Jones continues to push his dad's company:

The place to go is DrJonesNaturals.com. Ready to ship. They can shut down InfoWars Friday or next week, but DrJonesNaturals.com is still standing.

See The Alex Jones Show, June 11, 2024

https://www.banned.video/watch?id=6668c3307beac1344c8e476e at 2hours 44mins 7secs.

26. The Trustee is not aware of Jones having a financial interest in DrJonesNaturals.com, products sold on the site, or any agreement regarding compensation to Jones for the advertising or revenues. However, Jones continues to represent to his audience that purchasing products from DrJonesNaturals.com is how they can support the Jones' family.

Potential Diversion of Debtor Assets for a Commercial Purpose

- 27. The Trustee learned on June 12, 2024 that an aggressive "scrapping system" was seeking to extract the entire catalog from FSS website Banned.video website³. This occurred on the same day that Jones broadcast to his viewers that one of his loyal employees was attempting to download from the FSS site video archive of his shows—on Jones behalf.
 - 28. Jones discusses on air how he requested that InfoWars video archives be

³ Upon information and belief, the primary pages of InfoWars.com and Banned.Video websites allow viewers to download select broadcasts, but not the entire historical catalog. Trustee has been advised that even downloading the select broadcasts which are publicly available would take a significant amount of time (at least a couple of weeks) to accomplish.

downloaded, and stated as follows:

I go and talk to the security head guy. I'd figure something's been said to him, cause they, the security guy, the head guys nice, few security guys are great, but then CRO, these people kind of have them keep tabs on us. And he goes, 'yeah I just got asked about this, this morning. About, something about Rob Dew and trying to download stuff.' So I go into Rob Dew's office and I said, 'Hey Rob. Let me guess when I told you last Friday that I want you to go back and try and get our video archive back up cause I'm wanting to download our video archive, for posterity and everything else. It's my work. It's always been free to air'...so just an innocuous thing like me, last Friday, telling Rob Dew, well actually texting him first in the morning then I talked to him. So we have a record of it of course. My great, evil crime. I'm like hey people are having trouble finding all these older shows and they're really wanting them, I want to get that database up of PrisonPlanet.tv. So that all the listeners and viewers, who always been free to air, we have download buttons on all our videos. It's not like we're hiding some crime – robbing a bank. There's download buttons on them. Just like our podcast is free to air. We're free to air to the radio stations.

See The Alex Jones Show, June 12, 2024

https://www.banned.video/watch?id=666a1ed753e42166f5d2f391 at 4mins 6secs.

29. This content is owned by the Debtor and is property of the FSS estate. The Trustee believes that some or all of this content is available to the public for free download. However, FSS content should not be used for any commercial purpose by any person other than the Debtor. The value of any FSS property should inure to the benefit of the Debtor's creditors or Jones impending chapter 7 estate.

UNCERTAINTY WITH REGARDS TO AUTHORITY

30. Jones further represents on broadcasts, to employees and contractors that he is in charge of FSS. On his June 7, 2024, broadcast, Jones commented that he had to explain to the FSS security that:

I'm the sole member, I'm the boss of the LLC. The CRO told you he's the boss, Chief Reorganizing Officer, he's not. He does not have the power to hire and fire. I've just been letting him do that out of good faith, even though I've disagreed with some stuff.

See The Alex Jones Show, June 7, 2024, https://www.infowars.com/posts/infowars-on-the-edge-alex-jones-gives-a-bankruptcy-update/ at 3mins 20 seconds.

31. Jones also indicates in his broadcasts that the Court is going to dismiss the case on June 14 and cede control to him so that FSS can go on operating under his control. This narrative has been a constant theme throughout Jones broadcast since June 1, 2024.

SUMMARY OF OPTIONS

- 32. How to deal with the situation is a conundrum. The Trustee is focused first and foremost on employee safety and security. The Trustee is also very concerned about the preservation of assets of the estate and payment of administrative obligations incurred during the bankruptcy including professional compensation, but more importantly all tax, employee and costs of business operations.
- 33. The Trustee is concerned about both the behavior of Jones as well as the potential behavior of some of his viewers. Jones' behavior in the recent broadcast is much more erratic and unhinged than his typical rhetoric. The Trustee is concerned that Jones' increasingly poisonous rhetoric, including slipping back into theories related to the Sandy Hook shootings—the same topic that led to the present financial difficulties --- and diversion of advertising to his father's company creates potential financial harm to the estate. Perhaps more concerning, the escalating tensions—aggravated by the competing views as to relative scope of authority -- puts employees and security staff inside the studio at undue risk of physical harm. It is impossible to unring the bell. These recent actions inform the Trustee's recommendation.
- 34. The Court must determine whether to either dismiss the case or convert the case to one under chapter 7 of the Bankruptcy Code. The Court must also consider the best timing for any action.

Considerations Regardless of Dismissal or Conversion

35. <u>Authority</u>. The conversion of Jones' personal case appears to be a foregone conclusion. The Trustee is concerned about the risks to a chapter 7 trustee (for either the Jones case or FSS's case, if converted) if the current questions with regards to authority are not addressed

by an order of this Court. A chapter 7 trustee appointed over an operating company involves a level of risk even in the best of scenarios. The circumstances present in this case are far less than ideal. Jones' on air comments are an example of the following serious security problems if the Court does not clarify the party with authority over FSS:

- a. FSS security will not know whether to take direction from Alex Jones or the Court appointed responsible person;
- b. FSS employees will not know whether to take direction from Alex Jones Court appointed responsible person;
- c. In the unhappy event that it is needed, law enforcement will not know whether to take direction from Alex Jones or the Court appointed responsible person.

Any order should clarify the party who has authority with regards to matters related to FSS.

- 36. Adversary Proceedings. Which, if any adversary proceedings should be retained by the Court. Jones' personal chapter 11 will be converted to a case under chapter 7 and a chapter 7 trustee will be appointed. The 100% membership interest in FSS will be a non-exempt asset to be administered by the chapter 7 trustee. Given the maturity of the adversary proceedings pending in this Court, and the impact of the judgments (or settlements) on the administration of Jones' case, the Trustee recommends retention by this Court of the adversary proceedings.
- 37. <u>Timing</u>. The Court must determine whether to either dismiss the case or convert the case to one under chapter 7 of the Bankruptcy Code. The Court must also consider the best timing for any action. If dismissal or conversion is not immediate to allow continued liquidation of inventory, the Court should enter an order to facilitate a more orderly exit to the bankruptcy case or conversion to chapter 7.

Dismissing FSS' Subchapter 5 Bankruptcy Case

38. Certain parties contend that dismissal of this case, will maximize the return to creditors by providing for an orderly liquidation of assets through continued operations for a few

months, with Mr. Jones' continued employment by the company during this time. This will allow the company to liquidate remaining inventory in the ordinary course of business while simultaneously providing an opportunity to market FSS as a going concern or maximize the recovery of an asset sale. The Trustee concurs that sales are higher when Alex Jones is on the air, particularly when he is actively promoting FSS products. As set forth above, however, there are competing employee safety concerns and potential liability concerns. The Trustee also agrees that an orderly operating wind-down should produce the best recovery for creditors.

- 39. The Trustee is apprehensive about the effect of returning control and management to Mr. Jones through dismissal. Given Jones' *modus operandi* prior to and during the case, the Trustee expects that returning control to Jones will result in diminished value to FSS' assets through inadequate management, waste and loss. If Jones continues to utilize counsel and a financial advisor, much greater confidence exists. However, the financial advisor was in place during the recent concerning behavior described above. Jones has demonstrated that he does not always heed the advice of his advisors nor does he keep them fully informed. Further, Jones trumpets on broadcasts that FSS is no longer his livelihood, and he encourages viewers to buy products from his father's company, rather than FSS. The Trustee is concerned about entrusting the company to someone who acknowledges that he is uncontrollable.
- 40. Dismissal will release the case from the bankruptcy court's jurisdiction, with the exception of any adversary proceedings the Court retains. Any issues between the Texas and Connecticut Plaintiffs could be sorted out in state court, or possibly in Jones chapter 7 case. The Trustee appreciates the attraction of returning the parties to the point immediately prior to the filing of this bankruptcy case.
 - 41. Last, there is the important question as to whether any Jones chapter 7 Trustee has

management rights over FSS, and whether the Jones chapter 7 Trustee or Alex Jones should receive control over the millions in cash in the FSS bank accounts. *See* ECF #s 933 and 943.

Converting the Case to Chapter 7

- 42. Certain parties ask that this Court to convert the case to one under chapter 7 of the Bankruptcy Code. A chapter 7 case ensures that all creditors would be paid within the bankruptcy priority scheme, avoiding a rush to the courthouse steps and the potential for conflicting orders entered by the respective state courts.
- 43. A Debtor does not typically operate after a chapter 7 conversion. The Trustee believes that there is inventory that can be sold which would likely yield greater value if sold in a wind-down as opposed to a non-operating Debtor. There is also potential value in the InfoWars platform. There is the potential for value loss if the Debtor does not operate in an orderly wind-down.
- 44. A conversion would permit the potential value of avoidance actions to be retained. The Trustee does not know the viability or collectability of any potential chapter 5 claims.
- 45. All assets of the Debtor will be placed in the control of an estate fiduciary working for the benefit of all parties. If any asset were to wander off, the chapter 7 trustee could pursue recovery in this Court.

Practical considerations in the event of Dismissal of the FSS Case:

- 46. If the Court dismisses this case, immediate consideration should be given to the following:
 - a. Immediate direction from the Court as to whom the CRO should release authority over the FSS bank accounts.
 - b. Creating an administrative claims escrow to ensure that the obligations incurred

- by the estate during the case, including employee payroll and benefit obligations and any taxes are satisfied.
- c. If not determined at the time of dismissal, an accelerated schedule for determining the rights of a chapter 7 Trustee for the Jones' estate which will own 100% of the FSS membership interests should be set out.
- d. Whether to dismiss the case with prejudice to refiling for 180 days without prior approval of this Court.

Practical Considerations for Converting to Case to a Chapter 7 Case

- 47. The Trustee is concerned that an immediate conversion would throw a panel chapter 7 trustee who is unfamiliar with the situation into a chaotic and potentially dangerous situation. Assets could be lost and the value of inventory (and any possible going concern value) diminished if the Debtor does not operate for a period of time with assets sold in an orderly wind-down.
- 48. If the Court converts this case to Chapter 7, immediate consideration should be given to the following:
 - a. <u>Authority</u>. The Jones chapter 7 trustee and Alex Jones may disagree regarding who has management rights over FSS. *See* ECF #s 933 and 943. This Court should give the parties immediate direction as to who is responsible and has authority to act on behalf of the Debtor. A person should be designated to be responsible for securing assets and building during the interim period before a trustee takes possession. Based upon his broadcast, Alex Jones believes that he has sole authority to make these decisions. If the Court appoints anyone other than Jones to handle this function, an order should be entered clarifying the authority of the party and preventing Jones' interference.

- b. Operations. whether FSS should be allowed to operate for a short period (such as 30 days) in order to maximize the value of existing inventory. The Trustee understands that a significant amount of existing inventory could likely be sold yielding significant revenue⁴ if FSS is allowed to broadcast.
- c. The Timing of Conversion. It may take several days before an interim chapter 7 trustee to be appointed and evaluate the best course for a chapter 7 case. Immediate consideration should be given to whether some employees should remain for wind-down and to secure assets (even if the company does not operate). For example, authority be granted for continued operations over the weekend beginning on Saturday, June 15 or later if requested by the Trustee.
- d. The Creditor's Meeting. The statute of limitations for chapter 5 causes of action held by the FSS estate will expire at the end of July 2024. The appointment of a chapter 7 Trustee and the scheduling of the creditors meeting by the US Trustee should occur so as to accommodate the limitations period and allow a trustee to become familiar with the case and causes of action as soon as possible. Time is of the essence. The US Trustee should be requested to move with haste.

SUBCHAPTER V TRUSTEE'S RECOMMENDATION

49. The Trustee is mindful that she is a fiduciary of the Debtor's estate. She has duties to all parties. The Trustee is basing her recommendation purely on what is in the best interests of the estate and all creditors. The Trustee's recommendation is not driven by the behavior of any party (other than Jones) or whether she believes that any party acted in good or bad faith throughout the case. The Trustee will not jump into the scrum. FSS is at the end of the chapter 11 road. The

⁴ The Trustee understands some products may need to be discounted.

Trustee recommends that the case be converted to a case under chapter 7 of the Bankruptcy Code because it is in the best interest of the estate.

Respectfully Submitted,

HASELDEN FARROW PLLC

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Subchapter V Trustee